

PLANNING APPLICATIONS COMMITTEE
16 MARCH 2017

APPLICATION NO.
16/P3738

DATE VALID
22.09.2016

Address/Site Land to the north and east of Marsh Court, Pincott Road, bound by High Path, Pincott Road, Nelson Grove Road and Rodney Place inclusive of garages, Marsh Court Play area and The Old Lamp Works, 25 High Path, London, SW19 2JL

Ward Abbey

Proposal: DEMOLITION OF EXISTING STRUCTURES ASSOCIATED WITH THE OLD LAMP WORKS, ALL GARAGES (74 IN TOTAL) AND SUBSTATION TO PROVIDE RESIDENTIAL ACCOMMODATION (134 UNITS - CLASS C3) IN BUILDINGS OF THREE - NINE STOREYS, PROVISION OF CAR PARKING (31 SPACES INCLUDING 5 DISABLED SPACES), CYCLE PARKING (249 SPACES), LANDSCAPING AND PUBLIC REALM WORKS TOGETHER WITH ASSOCIATED UTILITIES AND INFRASTRUCTURE.

Drawing No's:

2000; 2001; 2010; 2011; 2012; 2013; 2014; 2015; 2016; 2017; 2018; 2019; 2020; 2021; 2022; 2023; 2024; 2050; 2100; 2101; 2102; 2103; 2104; 2105; 2106; 2107; 2108; 2109; 2120; 2121; 2122; 2123; 2124; 2125; 2126; 2130; 2131; 2200; 2201; 2202; 2203; 2204; 2205; 2206; 2207; 2220; 2221; 2222; 2225; 2230; 2231; 2232; 2300; 2301; 2302; 2303; 2310; 2311; 2312; 2313; 2314; 2315; 2316; 2320; 2321; 2330; 2331; 2332; 2340; 2341; 2342; 2350; 2351; 2352; 2353; 2610; 2611; 2612; 2613; 2614; 2615; 2616; 2617; 2001 – Indicative Landscape Plan – General Arrangement; 2002- Indicative Landscape Plan (Colour)

Documents:

Design and access Statement (incorporating Landscaping Strategy), Inclusive Access statement, Townscape and heritage assessment, Archaeological assessment, Statement of community involvement, Sustainability statement, Energy strategy, Overheating analysis, Biodiversity survey report, Aborigicultural impact assessment, Operational waste management strategy, Noise assessment, Transport statement, Draft travel plan, Daylight, Sunlight and Overshadowing assessment, Flood risk assessment, Foul sewage and utilities strategy, Ground investigation report, Air quality assessment; and, Draft construction management plan

Addendum Plans/Documents: Response to LBM Urban Design Comments January 2017; Ellis + Moore Clarification of Bio Retention Suds and

Permeable Paving (2017 01 18); Letter dated 19th January 2017 from Savills to Mr J. Vale; Response to Objection from 68 Nelson Grove Road – PRP; Single Aspect Units Assessment; PRP Architects – Average Daylight Factor Analysis – Proposed Scheme Test - 7th March 2017; PRP Architects – Response to Daylight/Sunlight Queries – 7th March 2017

Contact Officer: John Vale (020 8545 3296)

RECOMMENDATION

GRANT PERMISSION SUBJECT TO ANY DIRECTION FROM THE MAYOR OF LONDON, THE COMPLETION OF A SECTION 106 AGREEMENT AND CONDITIONS.

CHECKLIST INFORMATION.

- S106 Heads of agreement: Yes
 - Is a screening opinion required: Yes
 - Is an Environmental Statement required: No
 - Has an Environmental Impact Assessment been submitted –No
 - Design Review Panel consulted – Yes
 - Number of neighbours consulted – 413
 - Press notice – Yes
 - Site notice – Yes
 - External consultations: Greater London Authority, Transport for London, Environment Agency, Metropolitan Police, Greater London Archaeological Advisory Service, Thames Water Utilities,
 - Number of jobs created – n/a
 - Public Transport Accessibility Level (PTAL): Level 4 TFL Information Database (On a scale of 1a, 1b, and 2-5, 6a, 6b where zone 6b has the greatest accessibility)
 - Flood Risk Zone 1
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1. INTRODUCTION

- 1.1 The application is brought before PAC due to the level of objection to the proposal and the scale and complexity of the proposals. For the time being, the decision of Merton's Planning Committee is not the final decision as the major application is required to be referred to the Mayor of London for any direction.
- 1.2 The application is the first phase of a wider masterplan for the whole High Path Estate. The outline planning application for the remaining phases of the masterplan to redevelop the High Path Estate is due to be submitted to the Council in February 2017. Reference will be made throughout this report to connections between this first phase application and the wider masterplan as the first phase scheme proposals have been developed to form part of, but not to be dependent upon, the emerging wider regeneration proposals.

2. SITE AND SURROUNDINGS

- 2.1 This first phase application site covers an area of 0.847 hectares occupying the south eastern corner of the High Path Estate and the Old Lamp Works, bounded by High Path to the south, Pincott Road to the west and Nelson Grove Road and Rodney Place to the north and east. The plot consists of 74 garages and associated hardstanding, spread across the site from north to south and accessed from Nelson Grove Road and High Path, and an existing part-one storey part-two storey industrial unit (the Old Lamp Works) occupied by a book distribution centre with access from High Path located in the south and east of the site. The site also features the Marsh Court Play Area with access from Pincott Road located to the north west of the site.
- 2.2 The southern side of the site with a frontage onto High Path is located between a 12 storey block of flats (Marsh Court) to the west of the site and a three storey office building occupied by the Probation Service to the east. On the opposite side of High Path to the south are a part two/part three storey office building and a two storey place of worship.
- 2.3 The western side of the site adjoins the 12 storey building Marsh Court providing residential accommodation and has a frontage onto Pincott Road. On the opposite side of Pincott Road to the west is a terrace of two storey residential properties with front gardens and the 12 storey building May Court providing residential accommodation.
- 2.4 The northern side of the site has a direct frontage onto Nelson Grove Road. On the opposite side of Nelson Grove Road is three and four storey residential accommodation.
- 2.5 To the east of the site are two storey residential properties (68 and 68a) on Nelson Grove Road, and a one storey building containing a place of worship (Merton Evangelical Church) and a number of two storey houses fronting Rodney Place. To the south east is a three storey building occupied by the Probation Service with frontage onto High Path and a substation.
- 2.6 The application site and the wider High Path Estate are located in the South Wimbledon/Colliers Wood Intensification Area as identified in the London Plan and the Estate covers an area of approximately seven hectares. The character of the High Path Estate is almost wholly residential, with just one shop and a former police community office, with permission for use as a community centre, on Pincott Road, to the west of the application site, within the estate boundary. On the edge of the estate is a small pub and community hall to the west and south of the application site. The estate is bounded by Merton High Street to the north, Abbey Road to the east, High Path to the south and Morden Road to the west. South Wimbledon Underground station is located to the north west of the estate and the application site.

- 2.7 The estate comprises 608 homes and is characterised by a mix of architectural styles and building typologies. Building heights on the estate vary from two storey residential buildings to three twelve storey towers at the centre of the estate. Moving away from the centre of the estate towards Merton High Street the scale gradually decreases down to 2 and 3 storey houses.
- 2.8 The site is not within a Conservation Area. The site is located within an Archaeological Priority Zone, the Wandle Valley Regional Park 400m buffer and a critical drainage area.
- 2.9 The application site enjoys good access to public transport, (PTAL level 4) as it is within easy walking distance of several bus stops and South Wimbledon Underground station.
- 2.10 The site lies in Flood Risk Zone 1.
- 2.11 Part (0.25 hectares) of the application site known as The Old Lamp Works, 25 High Path is Site Proposal 46 in the Merton Sites and Policies Plan and is allocated for residential (Use Class C3) or education (Use Class D1).

3. CURRENT PROPOSAL

- 3.1 The current first phase proposal of the redevelopment of High Path Estate involves the demolition of the Old Lamp Works building and 74 garages to provide 134 residential units (23 x 1 bedroom, 70 x 2 bedroom, 38 x 3 bedroom and 3 x 4 bedroom units) (use class C3), 31 car parking spaces, 245 cycle parking spaces and associated children's play space and landscaping.
- 3.2 The 134 residential units would be provided in a mix of houses and flats, as set out in the table below.

	1Bed	2 Bed	3 Bed	4 Bed	Total/ %
Flats	23	67	27	0	117/
Duplexes	0	0	5	3	8/
Houses	0	3	6	0	9/
Total	23/17.2%	70/52.2%	38/28.4%	3/2.2%	134/100%

- 3.3 In terms of affordable housing provision, of the 134 proposed units in Phase One, 80 (59.7% by unit; 58.9% by habitable room) would be affordable homes as set out in the table below. The affordable units will all be rented accommodation to provide replacement homes for the existing tenants of the High Path Estate. As there are no existing intermediate tenures to be decanted, no intermediate tenures are proposed. The applicant has committed to providing new homes to existing tenants at the same rental levels as their existing tenancies. All residents homeowners will be offered a new replacement home in High Path at no additional cost if the homeowner chooses to stay.

Unit Type	Tenure	No. of Units
1 bed	Affordable Rent	14
2 bed	Affordable Rent	45
3 bed	Affordable Rent	19
4 bed	Affordable Rent	2
TOTAL		80

- 3.4 The site has a PTAL of 4 and has the characteristics of an urban setting. The density of the proposed development is 158 units per hectare or 515 habitable rooms per hectare.
- 3.5 The development would take the form of seven residential blocks, A, B, C, D, E (x2) and F. Apart from Block E, containing two and three storey mews houses and cottages, the remaining blocks would range in height from four and five storeys, incorporating setback (Block F and Block D), to seven storeys (incorporating set back) (Block C), to nine storeys (incorporating two storey set backs) (Blocks A and B). Blocks A and B would front onto Pincott Road on the western side of the Phase One site, situated closest to the existing 12 storey Marsh Court and May Court beyond. Block D would have a frontage onto Nelson Grove Road and Block F frontage onto the newly created mews street, providing a new vehicular and pedestrian link between Nelson Grove Road and High Path. Block C would have a frontage onto High Path and Block E mews houses and cottages would have frontages onto Rodney Place and the newly created mews street.
- 3.6 All units would either meet or exceed the minimum space standards as set out by the Mayor, the DCLG National Technical Standards and relevant Building Regulations standards set out in the minor alterations to the London Plan (2016), with 10% of the units are designed to be wheelchair accessible or adaptable. Of those blocks that contain flats (Blocks A, B, C, D and F), 46% of the units are dual or triple aspect, and there are no north facing single aspect units. Only 11% of the rooms within single aspect units have daylight levels below the BRE guidance. However, as is detailed in the planning considerations section of this report, officers consider that this level is acceptable given other material considerations. All of the mews houses and cottages in Block E are either dual or triple aspect.
- 3.7 The applicant's Design and Access Statement and addendum 'Response to LBM Urban Design Comments January 2017' explain the key design principles that have been taken forward in developing the Phase One scheme and the applicants wider masterplan for the whole High Path Estate. These principles were developed having regard to the emerging Estates Local Plan. The layout, scale and design of the blocks in Phase One will be integrated into the wider masterplan thereby creating a series of character areas as follows (as set out in Section 4.3 of the Design & Access Statement):

- i) The perimeter mansion blocks A and B (Park Character) will enclose the western edge of the application site and in the wider masterplan form the eastern edge of a future park. Each mansion block has articulated and dedicated ground floor entrances and cores with individual apartments provided with private amenity spaces in the form of inset terraces. A two storey set back raises the building height of the mansion blocks to nine storeys. Each block would be primarily constructed from London Stock facing brickwork with the setback upper floors finished in deep red anodised metal cladding.
- ii) Block D (Inner Street Character) faces Nelson Grove Road and in contrast to the adjoining mansion blocks, is arranged and divided into small street blocks with ground floor entrances to apartments above.
- iii) Block F (Mews Character) will provide opportunity for natural surveillance of the proposed, one way, north-south link between Nelson Grove Road and High Path. The block is contemporary in design with the setback fifth floor finished in bronze metal cladding.
- iv) Block C (Mews Character) – marks the end of the new north-south mews and forms the southern extent of the application site. High Path is poorly defined with little street character. The seven storey building (incorporating set back) will read as two distinct buildings. The ground floor will be taller than the above intermediate levels, ensuring a street presence. The set back will be finished in dark grey metal cladding.
- v) Block E (Rodney Place Character) – consists of two separate blocks: two storey mews cottages and three storey houses. They continue the building line of existing residential properties on Rodney Parade.

3.8 In terms of amenity space, all of the residential units will have access to private amenity space that meets minimum requirements in the form of private gardens, terraces or balconies. Each house is provided with a front and rear garden comprising at least 50 sqm. Communal amenity space is proposed within the courtyard of Blocks A, B, D and F and to the rear of Block C.

3.9 In terms of car parking the proposal includes the re-provision of the private 18 on-street car parking spaces that are currently situated on Pincott Road and proposes a further 13 parking spaces, a total of 31 surface level spaces. Five disabled parking spaces are proposed on site. Twenty percent of all spaces will be provided with electric vehicle charging points. In terms of cycle parking provision, 245 cycle parking spaces and 4 visitor spaces are proposed. All cycle storage will be

provided within each individual dwelling as additional storage space next to the entrance.

4. PLANNING HISTORY

96/P0900 – Old Lamp Works – CHANGE OF USE FROM GENERAL INDUSTRIAL (B2) USE TO OFFICE, WAREHOUSING AND DISTRIBUTION (B1/B8) USE.

5. CONSULTATION

- 5.1 The planning application was publicised by means of site and press notices, together with individual letters to 413 nearby addresses. Two consultations were undertaken. In response to the first consultation process, 25 replies were received. In response to the second consultation 4 replies were received. All of the representations received are summarised by subject matter below:

Resident Responses:

Height, bulk and massing

Representations were received expressing concern that the height of the proposed flats and townhouses are excessive and out of character with the nature of surrounding development.

Overlooking.

Numerous representations indicated concern that the distance between proposed flat buildings would be inadequate to prevent overlooking between newly proposed buildings, affecting the privacy of future occupants.

Furthermore, several concerns were identified with relation to overlooking and loss of privacy to existing surrounding buildings as a result of the proposed development.

Natural Light Access.

Several representations indicated concern that the height and orientation of the proposed buildings would result in the blocking of natural light to the windows and rear gardens of surrounding properties.

One such representation indicated that significant flaws were evident in the daylight and sunlight analysis provided with the application documents.

Impact of large scale construction works on surrounding residents.

Numerous representations indicated concern that the scale of the development would result in significant construction works affecting the quiet enjoyment of surrounding properties for an extended period. In this respect concern was expressed with regard to the impacts of noise, dust, vibration, traffic management and visual unsightliness during the construction phase of implementing any development approval.

Proposed development should incorporate best practice energy efficiency and renewable energy integration.

Representations indicated that new homes should achieve a high standard of energy efficiency, and incorporate features such as underfloor heating and triple glazed windows to reduce the future running costs for future residents.

One expressed a desire that rooftop solar panels and/or other renewable energy measures be incorporated in the development.

Materials/Finishes Info.

Two representations indicated that the plans and details submitted with the application were vague, and did not adequately specify the precise type and quality of external and internal materials and finishes for newly proposed buildings. It was stated that concerns were held about the visual impact that poor quality materials would have on the estate, in addition to the impact on the surrounding area.

Quality of finished product in Developer's other projects.

Two representations stated that they held concerns for the build quality and final selections of materials and finishes by the developer, as a result of having inspected other developments which the developer has completed. Concern was expressed that cheap or poorly selected fittings and materials will lead to damaged perceptions of the development site, as well as ongoing maintenance issues and poor living quality for future tenants.

Impact of future Secondary School.

Multiple representations indicated concerns that the impact of a proposed future secondary school near Merton Abbey Primary School had not been adequately considered by the development proposal. It was stated that the position of the proposed school would result in use of the development as a cut through to local transport links, with associated anti-social behaviour and loitering by students affecting future residents.

It was also stated that inadequate consideration had been given to the impact of traffic and parking demands which would result from peak school 'drop off' and 'pick up' times.

Substandard replacement housing.

Concern was raised in multiple representations that the proposed replacement housing in Rodney Place was not equivalent to the quality of housing in Pincott Road, from which occupants were being relocated.

It has been stated that the proposed new housing is of cheaper construction and materials. It is also stated that the new housing represents an overall reduction in size, parking availability, accessible garden space, storage facilities and room sizes.

Representations raised concern that there is a shortfall in the number of large family units in replacement housing stock being offered.

Representations also outlined concern about the functionality of the internal layouts of replacement housing, with multiple concerns being raised about the size and number of windows, and the use of internal bathrooms without direct natural light and ventilation access.

North-south road layout.

One representation received indicated concern that the proposed north-south road layout was not in keeping with the surrounding road pattern.

Tree Impacts.

Multiple representations indicated concern about the potential loss of mature trees and vegetation currently present on the site, in particular those existing in the location of the current children's play area. Comments received indicate a preference to retain, or at least relocate, existing mature trees and shrubs which are present on the site. Comments received indicate a preference for English species of trees and shrubs to be incorporated in any landscaping proposals so as to increase biodiversity within the site and broader area.

Loss of employment land.

One representation indicated that the proposed demolition of existing employment land, and its replacement with residential development, would have a detrimental impact on the number and quality of employment opportunities available within the area.

Loss of existing children's play area and outdoor space.

Multiple representations indicated disapproval at the proposed loss of the existing children's play area on the site. It was stated that the existing play area was well utilised and its loss, without replacement, will have an adverse impact on the local community.

In addition several representations indicated that the overall loss of existing open space, which will result from the proposed overall densification of residential development on the site, will be detrimental to the current character and amenity of the area.

Loss of car parking/garaging.

Multiple submissions raised concern over the loss of both existing on and off street car parking, and the inadequacy of parking provision within the proposed scheme. Specific comments indicated that there was a need to incorporate greater secure garaging options for future residents, and in particular residents being relocated from Pincott Road who currently have access to these facilities.

Inadequate internal flat layouts.

Several representations expressed concern regarding the internal layout and dimensions of the proposed flats. In particular concern was expressed in relation to the size and number of windows, the use of internal bathrooms and kitchens without external windows for light and ventilation, and the use of open plan living/kitchen areas.

Concern was also expressed about the proposed internal dimensions of rooms, and the adequacy of these as replacement dwellings for relocated residents.

Undesirable external appearance of flats & townhouses.

Multiple representations raised issue with the external appearance of the proposed flat and townhouse structures. In particular concern was expressed with regard to the proposed architectural character, external materials, orientation and size of the proposed structures.

Lack of adequate consultation by the developer.

Three representations raised concern that initial community consultation undertaken by the developer was inadequate, or that the results of the consultation were not adequately incorporated within the development scheme as currently proposed.

Traffic impact on existing residents.

Multiple representations raised concern that the proposal would result in unreasonable impact on surrounding residents by way of increased traffic and parking demands. Concerns raised identified the overall increase in traffic as a result of the increased residential density proposed, as well as short time intensive traffic impacts from construction vehicles during the development phase of the project.

Errors in sunlight and daylight analysis report.

One representation raised issue with calculations and findings made in the Daylight and Sunlight Report provided by the applicant. In particular, issues were raised with regard to:

- The angle of light restriction.
- The accuracy of diagrams used to determine the impact on the windows of 68 Nelson Grove Road.
- The 'No Sky Line' Calculations; and;
- The 'Annual & Winter Probable Sunlight Hours' Calculations.

Biodiversity impacts & inadequacy of report.

One representation expressed concern with regard to the Biodiversity Impact Assessment provided by Landscape Planning Ltd. The representation claims that a complete list of animals in the vicinity has not been provided, as the report fails to mention the presence of Eurasian Jays, Grey Herons or urban foxes which have been observed by local residents. The applicant has confirmed that Jays and urban foxes are not protected species and therefore no special measures are required. The applicant has confirmed that the Preliminary Ecological Appraisal identifies the Grey Heron within the desktop assessment.

Air quality impact & inadequacy of report.

One representation expressed concern with regard to the Air Quality Assessment Report provided by Peter Brett. The representation expressed concern that no specific analysis has been undertaken for

the impact on the surrounding dwellings, in particular 68 Nelson Grove Road.

Noise impact on surrounding residents.

One representation expressed concern with regards to the noise quality assessment provided with the application. The concerns relate to the impact of noise on the existing property at 68 Nelson Grove Road, as a result of the proposed 'new road' and future occupation of proposed Block's D & F.

New road impact on surrounding properties.

One representation raised concerns with regards to the impact of the proposed new road on surrounding properties. Specifically concern was raised with regards to:

- The close proximity of tree plantings to neighbouring property boundaries.
- The impact of light overspill from proposed road lighting.

5.2 Design Review Panel (July 2016)

The Panel emphasised that it was critically important to get this site right in terms of quality as it would be the first example of putting the masterplan into action. The masterplan needed to be got right first and this site would set the standard for implementing that vision. It would therefore be important in terms of public support and gaining planning permission smoothly for subsequent phases. The Panel felt that the proposal was not doing this at present and needed to do significantly more to meet this essential objective.

The most fundamental concern the Panel had, which emerged gradually through the discussion, was the relationship with the adjacent site between Rodney Place and the new mews street, consisting of two detached houses and a church in a former industrial building. The Panel felt it was likely this would be redeveloped at some point in the future, but the layout also had to plan for the possibility of it not happening and the proposals successfully integrating into this existing layout.

How the site could be developed was important to consider now because it would have a clear impact on the proposed mews street as much of its frontage was occupied by the adjacent site. Also, the currently proposed development would have a strong impact on how this site could be successfully developed in the future.

There was a sense that the mews street created a site that was too shallow and which created front/back issues as there would be two streets very close together. This led the Panel to question the rationale for placing the mews street where it was. It was suggested that if the mews street was moved further west a proper frontage would be possible on both streets and the block successfully completed.

Alternatively it could be moved further east. The applicant was encouraged to explore a range of possible different alignments.

The Panel were pleased to see the way Rodney Place had been augmented, but felt that the triangular space in front of the new houses should consist of landscaping only, rather than parking, as this ill-defined space could easily attract fly-tipping and unused vehicles. It was pointed out that for a street to operate successfully as a shared space, it needed to be designed for a 15mph maximum speed.

The Panel were clear in that they felt that it was the urban design that was not right with the proposal. There was not sufficient resolution between the old and the new. It was recommended that surrounding buildings were shown on the images. The architecture and house layouts were considered good.

There were concerns about the design of the mews street and the buildings lining it. The buildings seemed a bit longitudinal and were not sufficiently divided up as suggested by the elevations. The layout of the street itself did not seem to be well thought out. It had narrow pavements, one of which stopped abruptly half way along the street. This was not acceptable in terms of inclusive design. The street appeared to have very little character in it. Trees were shown on the CGI but not on the plans.

On the larger buildings the vertical elements of the building, which seemed derived from classical proportions, felt a bit stretched vertically. To remedy the proportions it was suggested they either needed to lose the top two storeys or the lower floor(s) needed to be raised or two to read as one. The larger buildings also had a degree of depth, from recessed balconies etc. but not much projection.

Overall the Panel felt that this proposal was not doing the masterplan justice. Whilst it was clearly a difficult site, it was essential it was a showcase for what the applicant wanted to achieve for the rest of the estate. The Panel felt there was a range of issues that needed much further consideration and were close to giving a red verdict.

VERDICT: AMBER

5.3 **External consultees.**

5.3.1 **Greater London Authority**

Principle of development – estate regeneration

Loss of the existing building and uses has been approved by the Council and the Mayor. The redevelopment of the site to provide additional homes is strongly supported. The affordable units will all be

rented accommodation to provide replacement homes for existing tenants of the High Path Estate.

Affordable housing

The proposal will deliver 80 affordable homes, equating to an offer of 59.7% (by unit). The affordable housing offer for Phase 1 meets local policy.

Housing mix of scheme provides a good range of unit sizes.

Density of the proposed development is 158 units per hectare/515 habitable rooms per hectare, within density range and is supported.

Children's play space the applicant's play space strategy is supported and appropriate financial contributions should be secured in the S106 by the Council to allow for the improvement of existing play spaces in the High Path Estate or the wider area or the creation of new play spaces in under-utilised areas of the Estate.

Urban design layout principles are supported. The form and massing is supported and consistent with that of the wider masterplan.

Architecture approach of strong vertical emphasis to mansion blocks and simple articulation to houses is supported.

Inclusive design support commitment to an improved pedestrian environment.

Climate Change Mitigation – further information required on the following matters:

- i) Energy efficiency standards and in particular the opportunity for further design measures to reduce unwanted solar gains.
- ii) District heating - The applicant should provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available through both the Phase 1 plant room and the emerging masterplan's energy centre.
- iii) Combined Heat and Power (CHP)- Further information on both the Phase 1 and future wider estate's CHP should be provided including the size of the engine proposed , the total space heating and domestic hot water demand of the development and the proportion of heat met by the CHP. The applicant should also provide the analysis used to determine the size of the CHP

including, suitable monthly demand profiles for heating, cooling and electrical loads.

- iv) The applicant should further consider the installation of photovoltaic (PV) technology in order to maximise the on-site savings, regardless of the London Plan target having been met. A roof layout with the possible PV installation should be provided.

Officers note that since the receipt of the GLA's Phase One comments, the applicants and the GLA have been in discussions and are now satisfied with the available data. The GLA have requested that the applicant further consider the installation of PV technology. This is addressed in the planning considerations section of the report. Officers note however, that the GLA consider that the carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.

Flood Risk - the approach taken is the minimum acceptable approach to surface water management.

Transport:

Car parking – largely acceptable but disabled parking spaces should be provided for each of the 13 accessible units, additional spaces should be designated. Officers note the issue of the number and availability of blue badge spaces. This is addressed in the planning considerations section of the report.

Cycle parking – acceptable

Travel planning – recommends that the final versions of the submitted draft travel plan and draft construction logistics plan are secured, monitored and enforced as part of a s106. Officers have considered the issue further with transport officers

Pedestrian environment – a pedestrian environment review Survey (PERS) or similar should be secured through a s106 agreement. Officers have considered the issue further with transport officers in the planning considerations section of the report.

5.3.2 **Metropolitan Police (Designing out crime unit).**
No objection.

5.3.3 Environment Agency.
Planning permission should only be granted with conditions relating to contamination, sustainable drainage and piling.

5.3.4 Transport for London.

The site has a good Public Transport Accessibility Level (PTAL) of 4, on a scale of 1-6 where 6 is the most accessible.

TfL welcomes the information on trip generation provided in the Transport Statement (TS). It should be noted that when developments for other phases of the overall masterplan come forward, the cumulative impact on the number of trips will need to be assessed.

Parking

Considering the site's good PTAL of 4, the applicant should investigate the possibility of reducing the proposed provision consistent with the objective to reduce congestion and traffic levels and avoid undermining walking, cycling or public transport. Officers address this matter in the planning considerations section of the report.

It is understood that 13 of the proposed car parking spaces may be converted into Blue Badge spaces if the need arises in the future. However as 10% of the residential units are wheelchair accessible/adaptable. for the development to be in accordance with London Plan Policy 6.13, it is requested that one Blue Badge space is provided for every accessible flat from the outset. The total number of spaces should be secured by condition. Officers address this matter in the planning considerations section of the report.

Twenty per cent of car parking spaces will be active Electric Vehicle Charging Points (EVCPs) and a further 20% will be passive. This should be secured by condition.

It is noted that new residents will be restricted from applying for parking permits within the CPZ, and this should be secured through the S106 agreement. However, further detail is requested regarding the proposals for the estates CPZ, timescales and implementation.

A Car Parking Management Plan (CPMP) should be secured by condition and include more information on the above. The CPMP should demonstrate how the proposed car parking spaces will be allocated to the residential units and how they will be managed. TfL also requests the car parking spaces are leased rather than sold with individual units to allow for future flexibility.

Cycle Parking

That proposal is within standards. The parking should be located in a secure, sheltered and accessible location and secured by condition.

Pedestrian Environment

It is requested a Pedestrian Environment Review Survey (PERS) or similar is undertaken to the local facilities and nearest bus stop in each direction. Any identified improvements should be agreed with the

council and secured through the s106 agreement. Officers have considered the matter further with transport officers in the planning consideration section of the report.

Travel Plan

TFL considered that the draft travel plan had shortcomings and needs to include targets for other (non-walking) modes of transport that the applicant seeks to increase or reduce to encourage sustainable travel. Targets should link directly to each objective and be set for 3 and 5 years post occupation. The Travel Plan should be secured, delivered, monitored and funded through the s106 agreement.

Delivery, Servicing and Construction

A draft Construction Logistics Plan (CLP) was submitted with the application. A final updated version of the CLP should be secured by condition.

5.3.5 Historic England.

The archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition requiring a two-stage process of archaeological investigation is therefore recommended.

5.3.6 Thames Water

No objection subject to imposition of conditions regarding the submission of a piling method statement and surface water drainage, and informatives to alert the applicant of the need to minimise groundwater discharges, approval for development over the line of, or within 3 metres, of a public sewer.

5.4 Internal Consultees

Future Merton

5.4.1 Biodiversity

The methodology, findings and recommendations of the submitted Biodiversity report are acceptable.

5.4.2 Open Space

A small area in the eastern section of the site is identified as an area deficient in access to local open space on the deficit maps in Appendix 2 of the Draft Estates Local Plan (Stage 2 consultation 1st February 2016 – 18th of March 2016). The application proposals include the provision of a park in the south of this application site. The proposed park will address this deficiency as it will enable adequate open space access for residents within the site. Further landscaping features including planting, furniture and increased lighting are required to ensure the usability of this space in accordance with Policy CS13 of The Core Strategy

5.4.3 Children's Play Space

With suitably worded conditions that ensure the submission of details, delivery and maintenance of play facilities in the proposed court yard and new park area, and improvements to the existing play space at the southern end of Dowman Close, the proposals would be acceptable.

5.4.4 Urban Design

The Council welcomes the current application as a kick start to the regeneration of the High Path Estate and supports its aspiration for a high quality residential area. Phase One should be presented as an exemplar to showcase the future development. The application has the potential to deliver this vision but does not provide the narrative of how this can be achieved. The applicant should provide fine grain illustration of the phased integration into the masterplan. This will enable assessment of the massing, scale, height, siting and layout of the first phase.

The applicant has provided a Design Addendum dated January 2017 titled 'Response to LBM Urban Design comments' in response to the above comments. The document addresses the majority of concerns and illustrates the detailed integration and long term future proofing.

5.4.5 Highways

The submitted parking survey has been undertaken in accordance with the Lambeth parking survey methodology which shows at times of peak residential parking demand there is sufficient on street space to accommodate further vehicles.

A parking management plan has been addressed within the Transport Statement (TS). The applicants state that in the future there is likely to be a CPZ consulted on the area surrounding the development and at present the High Path estate area has parking enforcement in place on estate roads which is undertaken by a private company. Given that the area is in a state of change the on street bays created by this development should be designated as shared use (visitor pay and display/ resident) therefore a high level of flexibility can be applied, and parking/ CPZ review can be undertaken at each phase of the high path estate redevelopment to ensure that the bays on the estate are being used as efficiently as possible by those that require them. Officers consider that these matters can be addressed on submission of the future masterplan for the site.

As the site is a decant development all future residents and their requirements are known, however in the unlikely event that a disabled person moves into the development and are not in the receipt of a disabled bay. A number of general parking bays will be convertible to disabled specifications. Or have a number of other options which are, they are able to request an on street bay within an immediate proximity of their development. Disabled persons with a blue badge are also

eligible to park in resident parking bays and pay and display bays without enforcement action being taken.

As all the future residents' needs are known the disabled parking provision has been calculated to cover these needs. The applicant has proposed a year's membership to a car club per household to residential units, excluding homes which will have on plot parking. The provision of a year's car free membership is not sufficient to facilitate a habitual change to the use of car clubs. Three years free membership is an established amount of time to facilitate the habitual change to the use of car clubs.

A detailed parking management plan should be submitted for approval via either condition or legal agreement. The parking management plan should elaborate on the issues raised above and provide a level of expectation management for existing residents of the estate who park around the site at present, future and decant residents. The parking management plan should also review the current restrictions in place on Rodney Place and assess the need to alter the existing parking restrictions.

No details of Electric Vehicle (EV) charging points have been submitted or show on any of the plans. Further clarification on EV charging points is required.

5.4.6 Climate Change

The applicant's submitted energy statement indicates that the proposed development should achieve a 36% improvement in CO2 emissions on Part L 2013 once the scheme is finally connected to a CHP engine. This would meet the sustainability requirements of Merton's Core Planning Strategy Policy CS15 (2011) and Policy 5.2 of the London Plan (2015).

The internal water consumption calculations submitted in the Sustainability Statement (dated Sept 2016) indicate that the development should achieve internal water consumption of less than 105 litres per person per day, equivalent to Code for Sustainable Homes Level 4.

The application is the first part of the wider estate masterplan and, as such, there is need for the use of interim gas boilers until the energy centre for the larger estate scheme is built out in subsequent phase 2. Should the wider estate regeneration not proceed the applicant has indicated that a CHP will be included in the proposal site. Officers consider that a sufficiently worded condition will ensure the delivery of a CHP in the event that the masterplan does not proceed.

5.4.7 Trees

No aboricultural objection to the proposed scheme.

5.4.8 Flood Risk

No objections on flood risk or drainage grounds. Officers recommend conditions in addition to those specified by the Environment Agency and Thames Water regarding the provision of a detailed scheme for the provision of surface and foul water drainage, that finished floor levels shall be set no lower than +250mm above external ground level, provision of flood warning and evacuation plan and informative relating to surface water runoff.

6. **POLICY CONTEXT**

6.1 NPPF - National Planning Policy Framework (2012)

- 4. Promoting sustainable transport.
- 6. Delivering a wide choice of quality homes.
- 7. Requiring good design.
- 8. Promoting healthy communities.
- 11. Conserving and enhancing the natural environment

6.2 London Plan (2015) relevant policies include:

- 2.6 Outer London: Vision and strategy
- 2.8 Outer London: Transport
- 2.13 Intensification Areas.
- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.11 Affordable housing targets
- 3.13 Affordable housing thresholds
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.9 Overheating and cooling.
- 5.10 Urban greening
- 5.11 Green roofs.
- 5.13 Sustainable drainage
- 5.15 Water use and supplies.
- 5.17 Waste capacity
- 6.3 Assessing the effects of development on transport capacity
- 6.5 Funding Crossrail and other strategically important transport infrastructure
- 6.9 Cycling
- 6.11 Smoothing traffic flow and easing congestion
- 6.12 Road network capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An Inclusive environment
- 7.3 Designing out crime
- 7.4 Local character

- 7.5 Public realm
 - 7.6 Architecture
 - 7.14 Improving air quality
 - 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
 - 7.18 Protecting open space and addressing deficiency.
 - 8.2 Planning obligations
 - 8.3 CIL
- 6.3 Merton Local Development Framework Core Strategy – 2011 (Core Strategy) relevant policies include:
- CS 8 Housing choice
 - CS 9 Housing provision
 - CS 13 Open space and leisure
 - CS 14 Design
 - CS 15 Climate change
 - CS 17 Waste management
 - CS 18 Transport
 - CS 19 Public transport
 - CS 20 Parking servicing and delivery
- 6.4 Merton Sites and Policies Plan – 2014 (SPP) relevant policies include:
- DM H2 Housing mix
 - DM H3 Support for affordable housing
 - DM D1 Urban Design
 - DM D2 Design considerations
 - DM O1 Open space
 - DM O2 Trees, hedges and landscape features
 - DM EP2 Reducing and mitigating noise
 - DM T1 Support for sustainable travel and active travel
 - DM T2 Transport impacts of development
 - DM T3 Car parking and servicing standards
 - DM T4 Transport infrastructure
- Part (0.25 hectares) of the application site known as The Old Lamp Works, 25 High Path is Site Proposal 46 in the Merton Sites and Policies Plan and is allocated for residential (Use Class C3) or education (Use Class D1).
- 6.5 London Borough of Merton Pre-Submission Estates Local Plan (Stage 3 Consultation 8th December 2016 – 3rd February 2017)
- EP H1 Townscape.
 - EP H2 Street network
 - EP H3 Movement and access
 - EP H4 Land use.
 - EP H5 Open Space.
 - EP H6 Environmental protection.
 - EP H7 Landscape
 - EP H8 Building heights.

- 6.6 Supplementary guidance.
DCLG Technical Housing Standards - 2015
London Housing SPG – 2016
Merton Design SPG – 2004

7. PLANNING CONSIDERATIONS

- 7.1 The main planning considerations include assessing the following:

- Principle of redevelopment
- Demolition and loss of existing uses
- Principle of residential land use
- Affordable housing
- Standard of accommodation
- Design, including layout, scale and massing and impact on locality and neighbouring amenity
- Housing Mix
- Access
- Transport
- Sustainable design and construction and energy
- Technical issues including flooding, air quality and contamination.
- Planning obligations

Principle of redevelopment

- 7.2 The site lies within an area identified in the London Plan as an area suitable for intensification of development (Area 44 in the London Plan). The plan indicates that across London intensification areas can accommodate a further 8,650 homes and 8,000 new jobs. The plan encourages and offers support for the development by boroughs of suitable strategies to realise the potential of intensification areas.
- 7.3 London Plan policy 2.13 identifies a number of key factors in decision making in these areas including seeking to optimise residential outputs and densities, providing necessary social and other infrastructure to sustain growth and where appropriate containing a mixture of uses. Decisions should support wider regeneration and should integrate development proposals to the surrounding areas.
- 7.4 Since 2014 the Council has been exploring the regeneration of the high Path and two other large housing estates managed by the applicant (Eastfields and Ravensbury Estates) in consultation with residents, the Mayor of London, TfL and CHMP.
- 7.5 The Council is now at the advanced stage of having a draft local plan document that has developed through various rounds of consultation and is ready to be presented to a Planning Inspector for consideration.
- 7.6 The plan's purpose is to shape and guide any redevelopment proposals on this and the other two estates that come forward within

the next 10-15 years. The plan has a key role to play in helping to deliver new homes and meet housing targets, to improve the building fabric and to improve infrastructure on the estate. The plan recognizes the opportunities presented on High Path to sustain much higher densities.

- 7.7 This planning application relates to the first phase of the regeneration of the High Path Estate. The applicant has assembled this site (incorporating the Old Lamp Works) in order to deliver new homes for existing residents of the Estate, without having to demolish existing homes and moving residents off-site. The application is the first phase of a re-housing and new housing strategy for the wider High Path Estate. The first phase responds directly to an identified need to improve the quality of the accommodation on the Estate.

Demolition of existing buildings and loss of existing uses

- 7.8 The proposals involve the demolition of 74 existing garages, the Old Lamp Works industrial/warehouse building and existing play area to the north of Marsh Court (a strategy for enhancements to play on and off-site is included as part of the proposals).
- 7.9 Paragraph 111 of the National Planning Policy Framework (NPPF) encourages the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of a high environmental value. The garages are considered to be substandard in size for modern cars and do not provide parking in line with modern standards. The Council does not have a policy to retain lock up garages and, coupled with the Council's objectives to support a major redevelopment of the estate, there is not overriding planning ground to seek their retention.
- 7.10 The Old Lamp Works buildings have no statutory or local protection and are considered to be of little architectural merit or worthy of retention. The Old Lamp Works is allocated as Site Proposal 46 in Merton's Sites and Policies Plan for residential or education use. The principle of the loss of the building and redevelopment for housing is therefore consistent with the Council's planning policies.

7.11 Principle of residential land use

Policy CS. 9 within the Council's Adopted Core Strategy [July 2011] and policy 3.3 of the London Plan [March 2015] state that the Council will work with housing providers to provide a minimum of 4,107 additional homes [411 new dwellings annually] between 2015 and 2025. London Plan Policy 3.3 encourages the delivery of housing through intensification, the realisation of housing potential in Areas of Intensification, and the sensitive renewal of existing residential areas. The site lies in the South Wimbledon/Colliers Wood Intensification Area

where development capacity for a minimum of 1,300 new homes and 500 new jobs has been identified by the London Plan.

- 7.12 The Merton Pre-Submission Estates Local Plan is at an advanced stage of preparation. It has been through two statutory consultation periods, and at the time of writing (March 2017) the consultation of the pre-submission publication has been completed. The Estates Local Plan is scheduled to be submitted to the Secretary of State for consideration at the end of March 2017. Policy EP H4 for the High Path Estate states that the primary land use for the Estate will be residential, to accord with the predominant land use of the existing site and surrounding area. That part of the site that lies outside of the boundary of the Estates Local Plan, the Old Lamp Works, is allocated as for either residential or educational uses in the Merton Sites and Policies Plan 2014.
- 7.13 In the above context, the principle of the redevelopment of the site for a residential use is compliant with national, regional and local planning policy.

Affordable housing

- 7.14 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units. Policy CS 8 within the Core Strategy states that for new development involving housing of 10 or more dwellings the affordable housing target is for 40% of the units to be affordable of which the desired tenure mix should be 60% social rented and 40% intermediate.
- 7.15 In terms of affordable housing provision, of the 134 proposed units in Phase One, 80 (59.7% by unit; 58.9% by habitable room) would be affordable homes. The affordable units will all be rented accommodation to provide replacement homes for the existing tenants of the High Path Estate. As there are no existing intermediate tenures to be decanted, no intermediate tenures are proposed. The applicant has committed to providing new homes to existing tenants at the same rental levels as their existing tenancies. All residents homeowners will be offered a new replacement home in High Path at no additional cost if the homeowner chooses to stay. As the proposed affordable housing offer meets development plan policy, no financial viability assessment was required to be submitted with the application. It is considered that the resulting affordable housing offer meets policy objectives.
- 7.16 Notwithstanding the offer of 59.7% affordable rented accommodation, it would be prudent for a legal agreement to ensure that at least 40% of the units be provided as affordable housing with at least 60% providing rented accommodation. The applicant has raised concerns regarding viability on the site in the event that the wider regeneration of the estate did not go ahead. A S106 agreement would therefore contain a review

mechanism and should planning permission for the wider masterplan scheme not be granted by first occupation, a financial viability assessment would be submitted to determine the level of affordable housing that can be provided on the current application site.

7.17 Layout

7.18 London Plan policy 7.1 considers that development should be designed so that the layout, tenure and mix of uses interface with the surrounding land. Policy 7.4 requires, amongst other matters, that buildings, streets and open spaces should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass. Policy 7.6 sets out a number of key objectives for the design of new buildings including the following: that buildings should be of the highest architectural quality, be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm. Policy 7.7 of the London Plan states that tall and large buildings should be part of a plan-led approach to changing or developing an area. Applications should include an urban design analysis and address a number of criteria.

7.19 Sites and Policies Plan policies DM D1 and DM D2: as well as LBM Core Strategy Policy CS14 are all policies designed to ensure that proposals are well designed and in keeping with the character of the local area. Policy EP H1 of the Pre-Submission Estates Local Plan sets out a number of criteria that should be addressed. Proposals will be expected to integrate well with the surrounding urban form in terms of layout, scale and massing, whilst making the best possible use of land. Policy EP H8 states that taller buildings may be considered appropriate to facilitate intensified use of the site. Building heights must be based on a comprehensive townscape appraisal and visual assessment.

7.20 The layout and scale of Phase One has been designed to integrate with the wider emerging masterplan vision for the whole estate. The submitted Design & Access Statement identifies that the seven urban blocks of Phase One form part of three distinct character areas:

- Park Character Area
- Inner Street Character Area
- Mews Character Area

7.21 Following concerns raised by the Council's Design Officer, the applicant has provided a document, 'Response to LBM Urban Design Comments' dated January 2017 to demonstrate how Phase One has been designed to integrate with the wider regeneration vision.

7.22 The proposals would deliver townscape improvements to the High Path Estate. The application site was seen having a poor street layout, with poor links to the local neighborhood and beyond. The Phase One

application and the emerging masterplan seek to create an urban grid pattern with perimeter blocks similar to that in the surrounding area. The layout would create a new one way north-south mews street, with frontages providing direct overlooking, through the site connecting Nelson Grove Road and High Path, and a new east-west access linking Block E and existing houses on Rodney Place. The proposals would provide significant benefits in terms of north to south and east to west permeability. By ensuring that the new east-west access is one way, this would limit the movement of vehicles through the application site, and would provide safe routes for pedestrians and cyclists. The improvements to the permeability of the application site would be facilitated by the demolition of the existing Old Lamp works.

7.23 Scale, bulk and massing and impact on locality

7.24 Design officers raised concerns that the submitted application posed difficulties in assessing the appropriateness of the proposals in terms massing, scale and height of the proposed blocks as they are only shown against the immediate context rather than in relation to an as yet un-submitted outline scheme.

7.25 Following receipt of further information from the applicant, 'Response to LBM Urban Design Comments' dated January 2017' officers consider that the scale and massing of the proposed blocks is considered to be consistent with the proposed massing of the future masterplan. The tallest blocks, mansion blocks A and B, will form part of the park character area. They will front the proposed park and adjoin other mansion blocks, thereby providing an appropriate setting. At 30m high the proposed scale is considered appropriate within this context. Design Officers have requested that details of the architectural execution of the elevations of blocks A and B are conditioned, to ensure that a successful relationship is achieved between the different parts of the building. In particular, the architectural execution of the massing should be carefully delivered, with emphasis on ensuring the buildings have a successful interface with the ground. Officers consider that a detailed design condition will ensure that the architectural execution of the massing can be delivered.

7.26 The proposed massing across the remainder of the Phase One site is lower and is consistent with the proposed massing of the future masterplan. The proposed 7 storey high block C on High Path will create a strong frontage along High Path. The proposed 4 and 5 storey buildings along Nelson Grove Road and the new north – south mews buildings (blocks D and F) are considered to complement the existing properties (including 68 and 68a Nelson Grove Road). Nevertheless, design officers have requested that the details of the architectural execution of the elevations of block D are conditioned, to ensure that a successful relationship is achieved between the different proportions of the building. In particular, the architectural execution of the massing should be carefully considered, with emphasis on ensuring the

buildings have a successful interface on the ground. The 2 and 3 storey block E buildings respond appropriately to the massing along the existing cul-de-sac Rodney Parade, and are consistent with the proposed massing of the future masterplan. Officers consider that a detailed design condition will ensure that the architectural execution of the massing can be delivered.

- 7.27 Along with details of the elevations of blocks A, B and D as outlined above, samples and details of all facing materials shall be conditioned to be submitted for separate approval, notwithstanding the details submitted as part of the planning application.
- 7.28 In terms of building heights, blocks A and B exceed 30m in height and therefore require an assessment against the criteria set out in Policy 7.7 of the London Plan. London plan policy 7.7 (Location and design of tall and large buildings) states that the location of a tall or large building, its alignment, spacing, height, bulk, massing and design quality should identify with and emphasise a point of civic or visual significance over the whole area from which it will be visible. Ideally, tall buildings should form part of a cohesive building group that enhances the skyline and improves the legibility of the area, ensuring tall and large buildings are attractive city elements that contribute positively to the image and built environment of London.
- 7.29 The application site (and the wider High Path Estate) is located in an Area of Intensification (No.44 London Plan 2016) and in an area with good access to public transport. Policy CS14 of the Council's Core Strategy at paragraph 22.20 that tall buildings may be suitable in areas of the borough where three factors are present: regeneration or change is envisaged; good public transport accessibility; and, existing higher building precedent. Policy EP H8 of the Pre-Submission Estates Local Plan states that taller buildings may be considered appropriate to facilitate intensified use of the site. Such buildings must be located in appropriately and relate well to the surrounding context and public realm, particularly at street level. Policy EP H8 would apply to that part of the application site that will include blocks A and B. As such, it is considered that there is policy support for the provision of tall buildings over 30 metres on the application site, when assessed on these terms outlined above.
- 7.30 In regards to the wider townscape, blocks A and B would sit well when viewed with other taller buildings proposed as part of the wider masterplan. The submitted visual impact assessment with long views shows that blocks A and B would be viewed as a part of the continuation of consistent building heights along the edge of the proposed Park, as part of the masterplan for the whole Estate.

Security

- 7.31 London Plan policy 7.3 aims to ensure that measures to design out

crime are integral to development proposals and are considered early in the design process, taking into account the principles contained in Government guidance on 'Safer Places' and other guidance such as Secured by Design' published by the Police. Development should reduce the opportunities for criminal and anti-social behaviour and contribute to a sense of security without being overbearing or intimidating. Places and buildings should incorporate well-designed security features as appropriate to their location.

- 7.32 The proposals include indicative security measures and lighting schemes. The details of both the security measures and lighting will be secured by condition. The Met Police are broadly supportive of the proposals and an informative regarding secured by Design accreditation is recommended.

7.33 Standard of Accommodation and Amenity Space

The DCLG guidance Technical housing standards – nationally described space standard (March 2015), the London Plan (2015) (Policy 3.5) and its supporting document, The London Housing Supplementary Planning Guidance 2016 provide detailed guidance on minimum room sizes and amenity space. These recommended minimum Gross Internal Area space standards are based on the numbers of bedrooms and therefore likely future occupiers. As **Appendix A** demonstrates, each flat either meets or exceeds the standards on room sizes and private amenity space.

7.34 Children's Playspace

- 7.35 Merton's Core Planning Strategy policy CS 13 and The London Plan policy 3.6 require housing proposals to provide play spaces for the expected child population and the Mayor of London's 'Play and Informal Recreation' SPG 2012 provides detailed guidance on this matter. This SPG suggests that new residential development yielding more than 10 children (as determined by the application of GLA child occupancy estimates) should provide suitable playspace as part of the development scheme. It is recommended that the shortfall in overall outdoor amenity space identified should be mitigated by a financial contribution towards improvements to playspace in a local park.
- 7.36 The submitted plans show that the proposed communal courtyard will provide 610sqm of playspace for under 5's and that the private rear gardens will provide 578.9 sqm. The expected child yield for this scheme has been calculated at 101.2 using the SPG, which would amount to an expected 1,109 sqm provision in accordance with the requirements set out in the GLA's SPG.
- 7.37 The application site includes an existing formal play area of approximately 1,000 sqm for children aged 0-11 that will be lost to enable the assembly of the site. The applicant has identified through a play strategy that children of all ages currently have access to over

1,350 sqm of existing play space (excluding Marsh Court play area on site). The applicant proposes reproviding the play space lost as a result of the development through:

- i) the provision of play facilities in the proposed new courtyard (overlooked by Blocks A, B, D and F);
- ii) a play facility to the south of the site, fronting High Path and the new north-south mews; and,
- iii) improvements to an existing play space within the applicant's control, at the southern end of Dowman Close.

Officers recommend a suitably worded play space condition that ensures the submission of details, delivery and maintenance of play facilities in the proposed court yard and new park area, and improvements to the existing play space at the southern end of Dowman Close. Officers consider that the combination of the new play facilities and improvements to existing play space is satisfactory and will meet policy objectives.

7.38 Impact upon neighbouring amenity

- 7.39 SPP policy DM D2 states that proposals must be designed to ensure that they would not have an undue negative impact upon the amenity of neighbouring properties in terms of light spill/pollution, loss of light, quality of living conditions, privacy, visual intrusion and noise.

Daylight, Sunlight and Overshadowing

- 7.40 In support of the application the applicants have conducted a detailed survey and submitted a report that considers the potential daylight, sunlight and overshadowing effects of the proposals on surrounding residential properties. A further addendum to the report was submitted by the applicant in March 2017 entitled 'PRP Architects - Response to Daylight/Sunlight Queries – 7th March 2017. The methodology used follows Building Research Establishment best practice guidance and examines a number of recognized factors including Vertical Sky Components and Average Daylight factors.
- 7.41 The BRE Guide contains two tests, which measure diffuse daylight to windows. The first test is the Vertical Sky Component [VSC] (expressed as a percentage of the sky visible from the centre of a window). Diffuse daylight may be adversely affected if after a development the Vertical Sky Component is less than 27% and 0.8 times its former value.
- 7.42 The second test is daylight distribution; the BRE guide states that where room layouts are known, the impact on the day lighting distribution can be found by plotting the 'no sky line' in each of the main rooms. The no-sky line is a line, which separates areas of the working plane that can and those that cannot have a direct view of the sky. Daylight may be adversely affected if after the development the area of

the working plane in a room, which can receive direct skylight, is reduced to less than 0.8 times its former value.

- 7.43 It should be noted that a sunlight assessment only needs to be undertaken in relation to windows of neighbouring properties, which face within 90 degrees of due south. Sunlight may be affected if after a development the centre of the window receives less than 25% of annual probable sunlight hours and less than 0.8 times its former sunlight hours or it has a reduction in sunlight received amongst the winter months to less 5% of annual probable sunlight hours and less than 0.8 times its former value.
- 7.44 The applicants Daylight Sunlight Overshadowing (DSO) report identifies thirteen properties that are likely to be affected by the development in terms of their daylight and sunlight. Of those properties identified, 59 High Path – Elim Pentacostal Church; 61 High Path – Community Centre and 27 High Path – Wimbledon Probation Service, have not been tested further as they are not in residential use and their expectation of daylight is lower with a reliance upon artificial light to operate. Nos. 68a Nelson Grove, 1-3, 8-10 and 15-17 Tanner House; 8, 10 and Mychell House, and 1-14 Merton Place have not been tested further as these properties do not have windows that overlook the site or that directly face the development.
- 7.45 With respect to the remaining six properties: 50-60 Pincott Road; 1-66 Marsh Court; 1-66 May Court; 68 Nelson Grove Road, 1-8 Rodney Place and 13-16 Rodney Place, the submitted addendum dated 7th March 2017, provides a visual representation of the information presented in the submitted DSO report. The following provides a summary of the daylight access to the nine properties identified above as a result of the proposed development:

50-60 Pincott Road

- 7.46.1 Officers consider that only one window of ten that could be obstructed by the development is marginally below the targets set out in the BRE Guidelines and as such consider the level of impact acceptable.

1-66 Marsh Court

- 7.46.2 Officers consider that following the initial VSC test and further analysis using the No Sky Line, daylight distribution will remain good within all of the rooms once the proposed development is in place.

1-66 May Court

- 7.46.3 After the initial VSC test and further analysis using the No Sky Line, 59 out of 242 (24%) rooms will experience a noticeable impact on daylight availability as a result of the proposed development. Officers consider that whilst this is a significant impact, there are material considerations (detailed below) that relate specifically to the application site (detailed below).

7.46.4 68 Nelson Grove Road

Officers consider that following the initial VSC test and further analysis using the No Sky Line, daylight distribution will remain good within all of the rooms once the proposed development is in place.

7.46.5 13-16 Rodney Place

The results of the VSC test identify that two windows on the side wall of the property would experience a minor adverse and moderate adverse impact on daylight availability. The report assumes that the windows belong to circulation space. Officers consider that whilst this is a negative impact, there are material considerations (detailed below) that relate specifically to the application site.

7.46.6 27 High Path

The results of the VSC test identify that two windows would experience minor to moderate adverse impacts on daylight availability. Officers consider that whilst this is a negative impact, there are material considerations (detailed below) that relate specifically to the application site.

7.47 The site is unusually open with an overall low scale of existing development, punctuated by medium rise point blocks, for such an urban location. The submitted DSO report and addendum, identifies that properties in and around the site received unusually high levels of daylight and sunlight for an urban site. The Mayor's Housing SPG acknowledges that a degree of flexibility can be applied when using BRE Guidelines, with guidelines applied sensitively to high density development in opportunity areas, large sites and accessible locations, particularly in central and urban settings.

7.48 A further material consideration is that the London Borough of Merton Pre-Submission Estates Local Plan and masterplan proposals for the site envisage the demolition of buildings within and adjoining the application site, including those assessed by the DSO report. Thus, while officers acknowledge the proposals will have an impact on certain flats, unique circumstances arise in this instance that warrant a more flexible approach.

7.49 In terms of overshadowing, officers concur with the results of the findings in the DSO report and consider that all of the surrounding gardens and open spaces tested would receive good levels of sunlight with the proposed development in place.

7.50 Noise and vibration.

7.51 London Plan policy 7.15 seeks to ensure that development proposals manage noise by avoiding significant adverse noise impacts on health and quality of life and mitigate and minimise the existing and potential adverse impacts of noise. The applicant's noise and vibration report notes that glazing and ventilation systems having specific acoustic

attenuation properties will be required to meet design criteria. The submitted noise and acoustic report has been reviewed by the Council's Environmental Health Officers. No objections are raised and suitable conditions are attached as part of the recommendation to this report.

7.52 Construction phase

7.53 The development has the potential to adversely impact neighbouring residents during the construction phase in terms of noise, dust and other pollutants. As such, it is recommended to include conditions which would require a detailed method statement to be submitted to, and approved by, Merton Council prior to the commencement of the development.

7.54 Light spill

7.55 Light spill from the proposal is not expected to be significant given the scheme is residential. However, there is an external amenity space which would likely require lighting, this space is adjacent to the rear gardens of the dwellings to the east and could impact upon their rear windows. As such, it is recommended to include a condition which would require details of external lighting to be submitted to, and approved prior to occupation.

7.56 Transport, highway network, parking and sustainable travel

7.57 London Plan policies 6.3 and 6.12, CS policies CS20 and CS18 and SPP policy DM T2 seek to reduce congestion of road networks, reduce conflict between walking and cycling, and other modes of transport, to increase safety and to not adversely effect on street parking or traffic management; in addition, there is a requirement to submit a Transport Assessment and associated Travel Plan for major developments. London Plan policies 6.9, 6.10 6.13, CS policy CS20 and SPP policies DM T1 and DM T3 seek to promote sustainable modes of transport including walking, cycling, electric charging points, the use of Travel Plans and by providing no more vehicle parking spaces than necessary for any development.

7.58 The London Borough of Merton Transport Planner has reviewed this application, their comments are integrated into the assessment below.

7.59 Vehicle parking provision

7.60 The development would include the re-provision of 18 private on-street car parking spaces that are currently situated on Pincott Road and the provision of 13 further parking spaces, a total of 31 parking spaces, which is well within London Plan parking standards. A total of five disabled parking spaces are proposed. Both the GLA and TFL have requested that from the outset, disabled parking provision matches the number of proposed accessible units (13). However, in this particular instance, the site is a decant development and as such all future

residents and their requirements are known. The disabled parking provision has been calculated to cover these needs. Officers consider that in the unlikely event that a disabled person moves into the development and are not in the receipt of a disabled bay a number of options are available as follows:

- A number of general parking bays will be convertible to disabled specifications; and,
- they are able to request an on street bay within an immediate proximity of their development.

- 7.61 It should also be noted that disabled persons with a blue badge are also eligible to park in resident parking bays and pay and display bays without enforcement action being taken.
- 7.62 The proposed development does not expect to generate new person or vehicle trips as the scheme is a decant development. It is intended that existing residents of the High Path Estate would be transferred into the first phase. Therefore future residents' vehicles are already on the surrounding highway network. Nevertheless, a parking survey has been undertaken in accordance with the Lambeth parking survey methodology which shows at times of peak residential parking demand there is sufficient on street space to accommodate further vehicles. Given the above, it is considered that any impact upon parking pressure in the area would be negligible.
- 7.63 Notwithstanding the acceptability of the development in terms of parking pressure, the applicant has stated that each eligible person will receive a year's free car club membership. Officers consider that the provision of a year's car free membership is not sufficient to facilitate a habitual change to the use of car clubs. Officers consider that three years free membership, funded by the developer through a S106 agreement is an established amount of time to facilitate the habitual change to the use of car clubs. Furthermore, so as to achieve more effective use of available parking and to lessen reliance on individual households having exclusive access to a car, officers recommend restricting future residents from applying for residential parking permits in surrounding Controlled Parking Zones. Transport planning officers have confirmed that residents in adjoining CPZ's are not able to apply for a parking permit in any other CPZ. In addition, officers recommend that a detailed parking management plan should be submitted via condition. The parking management plan should elaborate on the issues raised above and provide a level of expectation management for existing residents of the estate who park around the site at present, future and decant residents.
- 7.64 Delivery, servicing and the highway network
- 7.65 The Transport Statement suggests that in terms of service and refuse generation, the development would only generate a few servicing trips from twice weekly refuse collections and home appliance/courier

deliveries. It is considered that the highway network can comfortably accommodate these vehicles.

- 7.66 It is considered that the new south-north mews road (it would be one-way northbound) is appropriately located and that swept paths show that servicing, delivery and refuse vehicles can enter and exit with no impact on the operation of the surrounding highway network, provided the junction radii's are protected with double yellow lines. Officers consider that a highways condition should ensure that all highways works on private land are completed to an acceptable standard. A dedicated mews street loading area could accommodate larger deliveries (up to 10m heavy goods vehicles).
- 7.67 Given the above, it is considered the development would be acceptable in terms of its impact upon the highway network.
- 7.68 Sustainable Travel
- 7.69 The developer has provided a draft Travel Plan in support of the application. It is considered that it sets out a number of useful measures which can reduce car use and ownership. However, it is recommended to include a condition which would require details of a full Travel Plan for the development.
- 7.70 In accordance with London Plan policy 6.9 and table 6.3, 245 long term cycle storage spaces and 4 short term cycle storage spaces have been provided, which exceed London Plan standards. The spaces are considered to be suitably secure and accessible.
- 7.71 London Plan policy 6.13 requires 1 in 5 (20%) of the parking spaces to be electric charging spaces (both active and passive). No details of electric vehicle charging points have been submitted by the applicant. Officers therefore recommend that a suitable condition is included requiring the submission of details prior to occupation of the development.
- 7.72 Refuse storage
- 7.73 Appropriate refuse storage must be provided for developments in accordance with policy 5.17 of the London Plan and policy CS 17 of the CS.
- 7.74 The location of the refuse storage for proposed houses, flats and maisonettes is considered to be appropriate and easily accessible by residents and Council (for collection). The applicant has provided an Operational Waste Management Strategy document that details the proposed waste and recycling storage facilities for Phase One. As such, it is considered that a condition could reasonably be added requiring details of refuse storage to be submitted to, and approved by, Merton Council prior to occupation.
- 7.75 ENVIRONMENTAL IMPACT ASSESSMENT AND SUSTAINABILITY

- 7.76 Environmental Impact Assessment
- 7.77 The application site is more than 1 hectare in area and therefore falls within the scope of Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. A Screening Opinion has been issued to the effect that the application does not need to be accompanied by a separate Environmental Statement.
- 7.78 Sustainability
- 7.79 Policy 5.2 Minimising Carbon Dioxide Emissions of the London Plan (2016) requires that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy. Merton's Core Planning Strategy Policy CS15 Climate Change (parts a-d) requires new developments to make effective use of resources and materials, minimise water use and CO2 emissions.
- 7.80 The applicant's Energy Strategy (September 2016) and Sustainability Statement prepared by PRP Sustainability, demonstrate that the development should achieve a 36% improvement over the 2013 Part L Building Regulations once the scheme is finally connected to a CHP engine. This would meet the sustainability requirements of Merton's Core Planning Strategy Policy CS15 (2011) and Policy 5.2 of the London Plan (2015).
- 7.81 The submitted energy strategy identifies that the application is the first part of the wider estate masterplan and, as such, there is a need for the use of interim gas boilers until the energy centre for the larger estate scheme is built out in subsequent phases. Should the wider estate regeneration not proceed the applicant has indicated that a CHP will be included in the proposal site. Officers consider that a suitably worded condition will ensure the delivery of a CHP in the event that the masterplan does not proceed. It is also recommended to include a condition which would require evidence to be submitted to, and agreed by, Merton Council which confirms the development has achieved the carbon savings outlined in the Energy and Sustainability Statement along with water consumption standards not exceeding 105 litres per person per day.
- 7.82 Other matters
- 7.83 Archaeology
- 7.84 The site lies within an Archaeological Priority Zone and as such the application was accompanied by a desk based Archaeological Assessment. Following assessment by Historic England, the Archaeological Assessment is recommended for approval subject to the completion of a field evaluation to determine appropriate mitigation.

Officers therefore recommend that a suitably worded condition should secure a two-stage process of archaeological investigation.

7.85 Biodiversity/Landscaping

7.86 Policy CS13 of the Core Strategy seeks to ensure that new developments incorporate and maintain landscape features such as trees which make a positive contribution to the wider network of open space.

7.87 The methodology, findings and recommendations in the submitted Biodiversity Survey Report are acceptable.

7.88 The proposals present an opportunity to secure net gains in biodiversity on this brownfields site. Chapter 5 of the submitted Design & Access statement provides a detailed landscape strategy. A suitably worded planning condition should deliver a landscape scheme that incorporates the use of native and wildlife friendly species and the provision of bird and bat boxes or tiles to address the recommendations in paragraph 10.1 of the submitted Biodiversity Survey Report to help mitigate effects upon wildlife and ensure the ecological enhancement of the site.

7.89 Officers also recommend a suitably worded condition instructing that any vegetation clearance must be undertaken outside of the breeding season (March-August) and that should any vegetation clearance be undertaken during the breeding season that the applicant appoint a suitably qualified ecologist to undertake a nest survey and submit a report to the Local Planning Authority for approval that lists these nests and proposes mitigation measures to ensure the proposed works do not adversely affect bird nesting on site prior to the commencement of vegetation clearance. This is proposed to ensure there are no adverse effects on bird nesting on site during the breeding season.

7.90 Flooding and contamination issues

Policies DM F1 and DM F2 of Merton's Sites and Policies Plan and policy S.16 of the Core Strategy seek to ensure that development will not have an adverse impact on flooding and that there would be no adverse impacts on essential community infrastructure. The site is located within Flood Zone 1 and is therefore at low risk of flooding from fluvial flooding. A Flood Risk assessment (prepared by Peter Brett Associates) and a site wide drainage strategy (prepared by Ellis Moore) have been submitted in support of the application. An addendum to the site wide drainage strategy (Clarification of Bio Retention Suds and Permeable Paving dated 18 01 2017) was provided by Ellis Moore to address concerns raised in relation to the

provision of SUDS. Officers consider that these concerns have now been addressed.

- 7.91 All forms of flood risk to and from the proposed development have been considered. These include tidal/ fluvial, existing sewers, proposed drainage, overland, infrastructure failure and groundwater. The primary risk of flooding to the site and other areas would be from the proposed drainage network. To mitigate this, the allowable surface water discharge from the site into the public sewer will be limited to as close to greenfield run-off rates as possible. The Environment Agency has specified that there should be no infiltration due to land contamination risks, and subject to condition, officers consider that the drainage design has addressed this. Attenuation in the form of SUDS techniques is provided to accommodate excess surface water up to and including a 1 in 100 year event with a 20% allowance for climate change. The SUDS techniques applicable to this site are buried pipe, permeable paving, green roofs, swales and tree pits. Provided that the mitigation measures proposed are followed it is considered that the development is appropriate from a flood risk perspective.
- 7.92 Air quality.
- 7.93 The NPFF recognises reducing pollution as being one of its core planning principles. It further indicates that LPA's should focus on whether the development is an acceptable use of land, and the impact of the use.
- 7.94 London Plan Policy 7.14 provides strategic guidance specific to air quality. It seeks to minimise exposure to existing poor air quality and make provision to address local problems. This is reflected by local policy, whereby the Core Strategy identifies the strategy to reduce air pollution through Policies CS18-20. The entire borough has been declared as an Air Quality Management Area.
- 7.95 London Plan policy 7.14 requires major developments to be at least air quality neutral and not lead to further deterioration of existing poor air quality, such as in Air Quality Management areas. Based on the comparison between total building emissions and Building Emissions benchmarks the proposed development meets the air quality neutral requirements and no mitigation is required.
- 7.96 Officers recommend that permission is made conditional on the development not commencing until an Air Quality and Dust Management Plan (submitted as part of the Demolition and Construction Management Plan), based on the recommendations set out in the applicant's technical report, has been submitted to and approved in writing to the Local Planning Authority for approval.
- 7.97 Site contamination
- 7.98 Sites and Policies Plan policy DM EP4 states that developments should seek to minimise pollutants and to reduce concentrations to

levels that have minimal adverse effects on human or environment health.

- 7.99 In light of the former commercial uses on part of the application site there is a potential for the site to suffer from ground contamination. Standard planning conditions are recommended that seek further site investigation work and if contamination is found as a result of this investigation, the submission of details of measures to deal with this contamination

8. LOCAL FINANCIAL CONSIDERATIONS

Mayor of London Community Infrastructure Levy

- 8.1 The proposed development is liable to pay the Mayoral Community Infrastructure Levy [CIL], the funds for which will be used by the Mayor of London towards the 'CrossRail' project.
- 8.2 The CIL amount is non-negotiable and planning permission cannot be refused for failure to pay the CIL. It is likely that the development will be liable for the Mayoral Community Infrastructure Levy that is calculated on the basis of £35 per square metre of new floor space.
London Borough of Merton Community Infrastructure Levy.
- 8.3 The London Borough of Merton Community Infrastructure Levy applies to the housing elements. This levy is calculated on the basis of £220 per square metre of new floor space for residential floorspace with social housing relief available under Part 6 of the Regulations to the affordable housing element of the scheme.

Planning Obligations

- 8.4 Regulation 122(2) of the CIL Regulations 2010 (continued in the CIL Regulations 2011) introduced three tests for planning obligations into law, stating that obligations must be:
- necessary to make the development acceptable in planning terms;
 - directly related to the development;
 - fairly and reasonably related in scale and kind to the development.
- 8.5 If a planning obligation does not meet all of these tests it cannot legally be taken into account in granting planning permission and for the Local Planning Authority to take account of S106 in granting planning permission it needs to be convinced that, without the obligation, permission should be refused.

Affordable Housing:

- 8.6 Of the 134 units, 80 (59.7% by unit or 58.9% by habitable room) would be affordable housing units, all of which would be for affordable rent. It would be prudent for a legal agreement to ensure that at least 40% of the units be provided as affordable housing with at least 60% providing rented accommodation.

- 8.7 In the event that the wider regeneration of the estate does not go ahead, a S106 agreement would therefore contain a review mechanism and should planning permission for the wider masterplan scheme not be granted by first occupation, a financial viability assessment would be submitted to determine the level of affordable housing that can be provided on site.

Transport, Highways and Public Realm

- 8.8 In this instance an agreement for the developer to provide a 3 year car club membership for future occupants of the development would be secured via a S106 agreement, along with no residential parking permits for residents of the development in adjoining CPZ's and the provision, delivery, monitoring and funding of a Travel Plan.

9. CONCLUSION

- 9.1 The proposals have developed over a considerable period reflecting both engagement by the applicant with local residents and from discussions between the applicant and Council officers. The application presents opportunities in the form of the delivery of much needed housing and affordable housing as an integral part of upgrading the environment for the whole of the High Path Estate. Officers consider that the merits of the proposals outweigh harm that might arise and that subject to appropriate S106 obligations including relating to affordable housing, and suitably conditioned the proposals may reasonably be approved.
- 9.2 The application is therefore recommended for approval subject to any direction from the Mayor of London, planning conditions and the completion of a S106 agreement.

RECOMMENDATION

Grant planning permission subject to any direction from the Mayor of London, planning conditions and the completion of a S106 agreement covering the following heads of terms:

1. Delivery of at least 40% of the residential units on the site as affordable housing accommodation (of which will be a minimum of 60% affordable rent); or
2. In the event that the planning permission for the wider regeneration of the High Path Estate is not granted prior to occupation of the Scheme, the delivery of affordable housing based on the outcome of a financial viability assessment.
3. Three years of Car Club membership per household at the applicants cost (excluding homes with on plot parking).
4. Exclusion of new residents from applying for parking permits in surrounding CPZ Zones.
5. The provision, delivery, monitoring and funding of a Travel Plan.
6. The developer agreeing to meet the Council's costs of drafting the Section106 Obligations [£ to be agreed].

7. The developer agreeing to meet the Council's costs of monitoring the Section 106 Obligations [£ to be agreed].

And the following conditions:

1. A.1 Commencement of development for full application
2. A.7 Approved plans; Refer to the schedule on page 1 of this report
3. No development above ground shall take place until detailed drawings, samples and a schedule of all materials to be used on all external faces (including roof) of the development hereby permitted, including window frames and doors (notwithstanding any materials specified in the application form and/or the approved drawings), have been submitted to the Local Planning Authority for approval. No works which are the subject of this condition shall be carried out until the details are approved, and the development shall be carried out in full accordance with the approved details.

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2015, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Policies Plan 2014.

4. No development above ground shall take place until drawings to a scale of not less than 1:20 and samples and/or manufacturer's specifications of the design and construction details listed below have been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out solely in accordance with the approved details.
 - i) metal, glass and wood work including private amenity spaces, balustrades to balconies showing glass to flats;
 - ii) all external window and door systems (including technical details, elevations, plans and cross sections showing cills and reveal depths);
 - iii) copings and soffits and junctions of external materials;
 - iv) rain water goods(including locations, fixings, material and colour)

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2015, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Policies Plan 2014.

5. No development shall take place until full details of a landscaping and planting scheme has been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as

approved before the commencement of the use or the occupation of any building hereby approved, unless otherwise agreed in writing by the Local Planning Authority. The details shall address the recommendations in paragraph 10.1 of the approved Biodiversity Survey Report (September 2016) and include on a plan, full details of the size, species, spacing, quantities and location of proposed plants, together with any hard surfacing, lighting, means of enclosure, and indications of all existing trees, hedges and any other features to be retained, and measures for their protection during the course of development.

- 6 Any vegetation clearance should be undertaken outside of the breeding season (March-August). Should any vegetation clearance be undertaken during the breeding season the applicant shall appoint a suitably qualified ecologist to undertake a nest survey and submit a report to the Local Planning Authority for approval that lists these nests and proposes mitigation measures to ensure the proposed works do not adversely affect bird nesting on site prior to the commencement of vegetation clearance. This is proposed to ensure there are no adverse effects on bird nesting on site during the breeding season.

7 B.4 Surface treatment

- 8 No development shall commence until full details associated with the on-site carriageway and footway arrangements, including full construction details, materials, lighting and drainage arrangements, have been submitted to and approved in writing by the Local Planning Authority. The approved details should be fully implemented in accordance with the approved plans prior to first occupation of the development. Reason. To ensure the safe operation of the carriageway and footway within the development and to comply with policy CS.20 of the Merton LDF Core Planning Strategy (2011).

- 9 Prior to first occupation of the development hereby approved the applicant shall have entered into and completed an agreement under the provisions of the Highways Act with the Local Highways Authority regarding associated footway and highway works. Such works as may be included within the agreement shall be completed before occupation of the development, unless otherwise agreed in writing.

Reason. To ensure the safe and efficient operation of the public highway in accordance with policies CS 20 of the Core Strategy 2011 and DM T2 of the Adopted Merton Sites and Policies Plan 2014.

- 11 D11 No demolition or construction work or ancillary activities such as deliveries shall take place before 8am or after 6pm Mondays - Fridays inclusive, before 8am or after 1pm on Saturdays or at any time on Sundays or Bank Holidays.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following

Development Plan policies for Merton: policy 7.15 of the London Plan 2011 and policy DM EP2 of Merton's Sites and Policies Plan 2014.

- 12 H6 No development above ground shall commence until details of secure cycle parking facilities for the occupants of, and visitors to, the relevant phase of the development have been submitted to and approved in writing by the Local Planning Authority. Such details as are approved shall be installed prior to first occupation and thereafter retained.

Reason: To ensure satisfactory facilities for cycle parking are provided and to safeguard the existing retained trees to comply with the following Development Plan policies for Merton: policies 6.13 and 7.21 of the London Plan 2015, policies CS18 and CS13 of Merton's Core Planning Strategy 2011 and policies DM T1 and DM O2 of Merton's Sites and Policies Plan 2014.

- 13 H8: Prior to the occupation of the development hereby permitted, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall follow the current 'Travel Plan Development Control Guidance' issued by TfL and shall include:
- (i) Targets for sustainable travel arrangements;
 - (ii) Effective measures for the on-going monitoring of the Plan;
 - (iii) A commitment to delivering the Plan objectives for a period of at least 5 years from the first occupation of the development;
 - (iv) Effective mechanisms to achieve the objectives of the Plan by both present and future occupiers of the development.

The development shall be implemented only on accordance with the approved Travel Plan.

Reason: To promote sustainable travel measures and comply with the following Development Plan policies for Merton: policy 6.3 of the London Plan 2015, policies CS18, CS19 and CS20 of Merton's Core Planning Strategy 2011 and policy DM T2 of Merton's Sites and Policies Plan 2014.

- 14 H11: Parking Management Strategy

15 **CO2 emissions**

Subject to completion of the approved energy strategy (i.e. installation of standalone CHP or connection to masterplan heat network) evidence must be submitted to the Local Planning Authority confirming that the development has achieved not less than a 35% improvement on Part L regulations 2013 for CO2 performance.

- 16 Sustainable Design and construction. No part of the development hereby approved shall be occupied until evidence has been submitted to and approved in writing by the Local Planning Authority, confirming that the development has achieved internal water usage rates equivalent to Code for Sustainable Homes Level 4. Reason To ensure that the development achieves a high standard of sustainability and

makes efficient use of resources and to comply with the following Development Plan policies for Merton: Policy 5.2 of the London Plan 2015 and Policy CS15 of Merton's Core Planning Strategy 2011.

17 C.6 Refuse and recycling

18 Non standard condition; External lighting.

Prior to commencement of development details of external lighting are to be submitted, which clearly demonstrates how the lighting features to be installed meets the principles that are set out in paragraph 5.8 of the submitted Design and Access Statement dated September 2016. Reason To protect and enhance biodiversity in accordance with policies 7.19 of the London Plan 2015 and CS 13 of the Merton Core Strategy 2011.

- 19 Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

- 20 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure.

- 21 No drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

Reason: Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

- 22 No development approved by this permission shall be commenced until a detailed scheme for the provision of surface and foul water drainage has been implemented in accordance with details that have been submitted to and approved in writing by the local planning authority and

in consultation with Thames Water. The drainage scheme will dispose of surface water by means of a sustainable drainage system (SuDS) in accordance with drainage hierarchy contained within the London Plan Policy (5.12, 5.13 and SPG) and the advice contained within the National SuDS Standards. Where a sustainable drainage scheme is to be provided, the submitted details shall:

- i) Provide information about the design storm period and intensity and the method employed to attenuate flows to sewer at a discharge rate of no more than 10l/s. Appropriate measures must be taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii) Include a timetable for its implementation;
- iii) Provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime;

Reason: To reduce the risk of surface and foul water flooding to the proposed development and future users, and ensure surface water and foul flood risk does not increase offsite in accordance with Merton's policies CS16, DMF2 and the London Plan policy 5.13.

- 23 Non-Standard Condition: The development permitted by this planning permission shall be carried out in accordance with the Ellis + Moore Clarification of Bio Retention Suds and Permeable Paving (2017 01 18). The SuDS measures including permeable paving and green roofs as well as bio-retention SuDS features such as swales and SuDS tree pits, shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of flooding to the proposed development and future users, and ensure flood risk does not increase offsite in accordance with Merton's policies CS16, DM F1 and DMF2 and the London Plan policies 5.12, 5.13.

- 24 Non-Standard Condition: The development hereby permitted by this planning permission shall ensure that finished floor levels for all residential units shall be set no lower than +250mm above the external ground level.

Reason: To reduce the risk of flooding to the proposed development and future users in accordance with Merton's policies CS16, DM F1 and the London Plan policy 5.12.

- 25 Non-Standard Condition: The development hereby permitted shall not be occupied until such time as a Flood Warning and Evacuation plan and procedure is implemented and agreed in writing to the satisfaction

of the Local Planning Authority. The Flood Warning and Evacuation Plan shall be implemented in accordance with the submitted Flood Risk Assessment document included and the procedures contained within the plan shall be reviewed annually for the lifetime of the development. Consultation of the plan shall take place with the Local Planning Authority and Emergency Services.

Reason: To reduce the risk of flooding to the proposed development and future users in accordance with Merton's CS16 and policy DM F1 and the London Plan policy 5.12.

- 26 Non-standard condition [noise levels plant/machinery]: Noise levels, (expressed as the equivalent continuous sound level) LAeq (10 minutes), from any new plant/machinery – including CHP plant - from the residential use shall not exceed LA90-10dB at the boundary with the closest residential property.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2015 and policies DM D2, DM D3, DM EP2 and DM EP4 of Merton's Sites and Policies Plan 2014.

- 27 Due to the potential impact of the surrounding locality on the development the recommendations to protect noise intrusion into the dwellings as specified in the Sharps Redmore, Planning Noise Assessment Report dated September 2016 shall be implemented as a minimum standard of mitigation from external noise before occupation of any dwelling.
- 28 An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority.
This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.
- 29 Subject to the site investigation for contaminated land, if necessary, a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme

must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

- 30 Any approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development, unless otherwise agreed in writing by the Local Planning Authority. Following the completion of any measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.
- 31 In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11' and where remediation is necessary a remediation scheme must be prepared, which is subject to the approval in writing of the Local Planning Authority.
- 32 No development shall take place until a Demolition and Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the demolition and construction period.

The Statement shall provide for:

- hours of operation
 - the parking of vehicles of site operatives and visitors
 - loading and unloading of plant and materials
 - storage of plant and materials used in constructing the development
 - the erection and maintenance of security hoarding including decorative - displays and facilities for public viewing, where appropriate
 - wheel washing facilities
 - measures to control the emission of noise and vibration during construction.
 - measures to control the emission of dust and dirt during construction/demolition
 - a scheme for recycling/disposing of waste resulting from demolition and construction.
- 33 All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance.

Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority.

- 34 No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological observation and recording in respect of any anticipated geotechnical site investigation, in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing and a report on that evaluation has been submitted to and approved by the local planning authority in writing. The applicant (or their heirs and successors in title) shall implement a programme of archaeological observation and recording in accordance with a Written Scheme of Investigation.
- 35 No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological mitigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing and a report on that evaluation has been submitted to and approved by the local planning authority in writing. The applicant (or their heirs and successors in title) shall implement a programme of archaeological observation and recording in accordance with a Written Scheme of Investigation.
- 36 The development shall not be occupied until the site investigation and post-investigation assessment has been completed in accordance with the programme set out in the approved Written Scheme of Investigation, and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.
- 37 Prior to occupation of the development hereby permitted, the applicant shall provide suitable plans to demonstrate 20% provision for charging electric vehicles in line with London Plan (March 2016) requirements, and hereafter shall be kept free from obstruction and shall be retained for parking purposes for users of the development and for no other purpose. To ensure the provision of an appropriate level of car parking and comply with policy CS20 of the Merton Core Planning Strategy 2011, the Mayor of London's Electric Vehicle Delivery Plan and policy 6.13 of the London Plan.
- 38 Non standard condition. Prior to first occupation of any part of the development details of the positioning and operational management of any on site security system shall be submitted to and approved in writing by the Local Planning Authority and be installed and operational and shall thereafter be retained and maintained. Reason; To ensure a safe and secure layout in accordance with policy DM D2 of the Merton Adopted Sites and Policies Plan 2015

- 39 H.7 Cycle Parking to be implemented
40 H13 Construction Logistics Plan
- 41 Prior to the occupation of the development, details of the design of the playspace in the proposed courtyard and new play facility to the south of the site (as described in the approved Design and Access Statement September 2016 and identified on the approved Drawing No. 2002 Indicative Landscape Plan (Colour))), its delivery, maintenance and retention and improvements to the existing play space at the southern end of Dowman Close (identified as Site E in paragraph 5.13 of the approved Design & Access Statement September 2016), shall be submitted for approval by the Local Planning Authority and the play space shall be thereafter retained and maintained. Reason; To ensure the provision and retention of suitable children's play space in accordance with the requirements of Merton's Core Planning Strategy policy CS 13 and The London Plan 2015 policy 3.6.

INFORMATIVES:

1. The applicant is advised that in accordance with paragraphs 186 and 187 of the National Planning Policy Framework, The London Borough of Merton takes a positive and proactive approach to development proposals focused on solutions. The London Borough of Merton works with applicants or agents in a positive and proactive manner by suggesting solutions to secure a successful outcome; and updating applicants or agents of any issues that may arise in the processing of their application. In this instance the Planning Committee considered the application where the applicant or agent had the opportunity to speak to the committee and promote the application.
2. The applicant is advised to contact the Council's Highways team on 020 8545 3151 before undertaking any works within the Public Highway in order to obtain the necessary approvals and/or licences.
3. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.
4. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing

wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality

5. With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921.
6. There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit thameswater.co.uk/buildover.
7. There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.
8. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
9. No surface water runoff should discharge onto the public highway including the public footway or highway. When it is proposed to connect to a public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required (contact no. 0845 850 2777).
10. Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with Historic England Greater London Archaeology guidelines. They must

be approved by the planning authority before any on-site development related activity occurs.

- 11 The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

[Click here](#) for full plans and documents related to this application.

Please note these web pages may be slow to load

APPENDIX A ON NEXT PAGE

Appendix A - accommodation and amenity space schedules

BLOCK A				
Unit Number/Type	GI Floorspace (sq.m)	Policy Standard for x Person Unit	Amenity Space (sq.m)	Policy Standard for x Person Unit
A01/1B2P Flat	51.6	50	7.0	5
A02/1B2P Flat	51.7	50	12.9	5
A11/2B4P Flat	71.6	70	7.0	7
A12/2B4P Flat	71.3	70	7.0	7
A13/1B2P Flat	50.9	50	7.5	5
A14/2B4P Flat	71.4	70	7.0	7
A21/2B4P Flat	71.6	70	7.0	7
A22/2B4P Flat	71.3	70	7.0	7
A23/1B2P Flat	50.9	50	7.5	5
A24/2B4P Flat	71.4	70	7.0	7
A31/2B4P Flat	71.6	70	7.0	7
A32/2B4P Flat	71.3	70	7.0	7
A33/1B2P Flat	50.9	50	7.5	5
A34/2B4P Flat	71.4	70	7.0	7
A41/2B4P Flat	71.6	70	7.0	7
A42/2B4P Flat	71.3	70	7.0	7
A43/1B2P Flat	50.9	50	7.5	5
A44/2B4P Flat	71.4	70	7.0	7
A51/2B4P Flat	71.6	70	7.0	7
A52/2B4P Flat	71.3	70	7.0	7
A53/1B2P Flat	50.9	50	7.5	5
A54/2B4P Flat	71.4	70	7.0	7
A61/2B4P Flat	71.6	70	7.0	7
A62/2B4P Flat	71.3	70	7.0	7
A63/1B2P Flat	50.9	50	7.5	5
A64/2B4P Flat	71.4	70	7.0	7
A71/3B5P Duplex	104.3	93	13.8	8
A72/3B5P Duplex	101.7	93	13.1	8
A73/3B5P Duplex	100.1	93	12.6	8
A74/4B7P Duplex	125.3	115	12.9	10
BLOCK B				
Unit Number/Type	GI Floorspace (sq.m)	Policy Standard for x Person Unit	Amenity Space (sq.m)	Policy Standard for x Person Unit
B01/2B3P WCH Flat	72.3	N/A	16.5	6
B02/2B3P WCH Flat	72.3	N/A	16.1	6
B03/1B2P WA Flat	59.5	N/A	7.7	5
B11/2B4P Flat	71.7	70	7.2	7
B12/2B3P WA Flat	71.9	N/A	7.5	6
B13/2B3P WA Flat	71.7	N/A	7.5	6
B14/2B4P Flat	71.7	70	7.0	7
B21/2B4P Flat	71.7	70	7.2	7
B22/2B4P Flat	71.9	70	7.5	7
B23/2B3P WA Flat	71.7	N/A	7.5	6
B24/2B4P Flat	71.7	70	7.0	7
B31/2B4P Flat	71.7	70	7.2	7
B32/2B4P Flat	71.9	70	7.5	7
B33/2B3P WA Flat	71.7	N/A	7.5	6
B34/2B4P Flat	71.7	70	7.0	7
B41/2B4P Flat	71.7	70	7.2	7
B42/2B4P Flat	71.9	70	7.5	7
B43/2B3P WA Flat	71.7	N/A	7.5	6
B44/2B4P Flat	71.7	70	7.0	7
B51/2B4P Flat	71.7	70	7.2	7
B52/2B4P Flat	71.9	70	7.5	7
B53/2B3P WA Flat	71.7	N/A	7.5	6
B54/2B4P Flat	71.7	70	7.0	7
B61/2B4P Flat	71.7	70	7.2	7
B62/2B4P Flat	71.9	70	7.5	7
B63/2B3P WA Flat	71.7	N/A	7.5	6
B64/2B4P Flat	71.7	70	7.0	7
B71/4B7P Duplex	125.8	115	12.9	10
B72/3B5P Duplex	105.1	93	14.1	8
B73/3B5P Duplex	104.8	93	14.1	8
B74/4B7P Duplex	125.8	115	12.9	10

BLOCK C				
Unit Number/Type	GI Floorspace (sq.m)	Policy Standard for x Person Unit	Amenity Space (sq.m)	Policy Standard for x Person Unit
C01/3B5P Flat	91.3	86	31.6	8
C02/2B4P WCH Flat	82.8	N/A	17.6	7
C03/2B4P WCH Flat	82.8	N/A	18.0	7
C04/3B5P Flat	91.2	86	46.9	8
C11/3B5P Flat	88.4	86	8.8	8
C12/2B4P Flat	74.8	70	8.8	7
C13/1B2P Flat	50.0	50	8.6	5
C14/2B4P Flat	74.8	70	8.8	7
C15/3B5P Flat	88.4	86	8.8	8
C21/3B5P Flat	88.4	86	8.8	8
C22/2B4P Flat	74.8	70	8.8	7
C23/1B2P Flat	50.0	50	8.6	5
C24/2B4P Flat	74.8	70	8.8	7
C25/3B5P Flat	88.4	86	8.8	8
C31/3B5P Flat	88.4	86	8.8	8
C32/2B4P Flat	74.8	70	8.8	7
C33/1B2P Flat	50.0	50	8.6	5
C34/2B4P Flat	74.8	70	8.8	7
C35/3B5P Flat	88.4	86	8.8	8
C41/3B5P Flat	88.4	86	8.8	8

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AA4586(PH1) High Path Phase 1

P

C42/2B4P Flat	74.8	70	8.8	7
C43/1B2P Flat	50.0	50	8.6	5
C44/2B4P Flat	74.8	70	8.8	7
C45/3B5P Flat	88.4	86	8.8	8
C51/3B5P Flat	88.4	86	8.8	8
C52/2B4P Flat	74.8	70	8.8	7
C53/1B2P Flat	50.0	50	8.6	5
C54/2B4P Flat	74.8	70	8.8	7
C55/3B5P Flat	88.4	86	8.8	8
C61/3B5P Flat	93.6	86	15.3	8
C62/1B2P Flat	50.0	50	13.5	5
C63/3B5P Flat	93.6	86	15.3	8

BLOCK D				
Unit Number/Type	GI Floorspace (sq.m)	Policy Standard for x Person Unit	Amenity Space (sq.m)	Policy Standard for x Person Unit
D01/1B2P Flat	52.2	50	5.9	5
D02/3B5P Flat	90.6	86	14.4	8
D03/3B5P Flat	90.6	86	22.3	8
D11/2B4P Flat	74.1	70	7.0	7
D12/3B5P Flat	89.8	86	8.5	8
D13/3B5P Flat	89.8	86	8.5	8
D21/2B4P Flat	74.1	70	7.0	7
D22/3B5P Flat	89.8	86	8.5	8
D23/3B5P Flat	89.8	86	8.5	8
D31/2B4P Flat	74.1	70	7.0	7
D32/3B5P Flat	89.8	86	8.5	8
D33/3B5P Flat	89.8	86	8.5	8
D41/2B4P Flat	73.1	70	7.0	7
D42/3B5P Flat	89.2	86	8.5	8
D43/3B5P Flat	89.2	86	8.5	8

BLOCK E				
Unit Number/Type	GI Floorspace (sq.m)	Policy Standard for x Person Unit	Amenity Space (sq.m)	Policy Standard for x Person Unit
E01/3B6P Townhouse	106.3	108	52.5	50
E02/3B6P Townhouse	106.3	108	53.2	50
E03/3B6P Townhouse	110.8	108	66.9	50
E04/2B4P Townhouse	93.9	79	93.1	50
E05/3B6P Townhouse	109.7	108	88.3	50
E06/2B4P Townhouse	93.9	79	105.6	50
E07/3B6P Townhouse	109.7	108	94.2	50
E08/2B4P Townhouse	93.9	79	112.1	50
E09/3B6P Townhouse	110.8	108	160.0	50

BLOCK F				
Unit Number/Type	GI Floorspace (sq.m)	Policy Standard for x Person Unit	Amenity Space (sq.m)	Policy Standard for x Person Unit
F01/1B2P Flat	52.1	50	18.1	5
F02/2B3P WA Flat	77.0	N/A	15.1	6
F03/3B5P Flat	97.0	86	29.3	8
F11/2B4P Flat	72.4	70	7.8	7
F12/1B2P Flat	51.3	50	6.9	5
F13/1B2P Flat	51.3	50	7.0	5
F14/2B4P Flat	72.9	70	7.0	7
F21/2B4P Flat	72.4	70	7.8	7
F22/1B2P Flat	51.3	50	6.9	5
F23/1B2P Flat	51.3	50	7.0	5
F24/2B4P Flat	72.9	70	7.0	7
F31/2B4P Flat	72.4	70	7.8	7
F32/1B2P Flat	51.3	50	6.9	5
F33/1B2P Flat	51.3	50	7.0	5
F34/2B4P Flat	72.9	70	7.0	7
F41/3B5P Flat	89.7	86	34.6	8
F42/3B5P Flat	87.8	86	36.7	8